

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

<b>CHMURA ECONOMICS &amp; ANALYTICS, LLC,</b>	)	<b>Case No. 3:19-cv-00813</b>
	)	<b>Judge Robert E. Payne</b>
	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>RICHARD LOMBARDO,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION IN LIMINE OF DEFENDANT RICHARD A. LOMBARDO TO EXCLUDE  
ADMISSION OF AN OFFER LETTER DATED JANUARY 25, 2019 AND RELATED  
TESTIMONY**

Pursuant to Fed. R. Civ. P. 402, 403, 404, and 608, Defendant, Richard Lombardo, moves the Court for an Order In Limine excluding from trial all testimony and evidence pertaining to an Offer Letter directed to Lombardo dated January 25, 2019, on the grounds that (1) the Offer Letter does not make any fact in issue more or less likely, (2) presentation of the Offer Letter at trial will be unduly prejudicial to Lombardo, (3) the Offer Letter would only be used to establish inadmissible character evidence, and (4) the Offer Letter is extrinsic evidence of character for truthfulness, which is strictly inadmissible.

A memorandum in support of this Motion is attached.

Respectfully submitted,

/s/ Thomas J. Powell

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*Attorneys for Defendant, Richard Lombardo*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing Motion in Limine has been served on this 22<sup>nd</sup> day of May, 2020, via the Court's electronic filing system upon the following:

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